

# Water-Related Permits Process Improvement Team (WRPPIT)

**Making clear whether and how a project gets to YES & transitioning to a consolidated state permit system.**

## MEETING RECORD

May 23, 2006

1-4, Director's Conference Room, Labor and Industries Building, Salem

**Members Present:**

Jas Adams, DOJ (by phone)  
 Ken Franklin, ODOT  
 Kim Grigsby, Water Resources  
 Patty Snow, ODFW  
 Kirk Jarvie, DSL  
 Laura Leshar, Project Manager, Office of Regulatory  
 Streamlining (RSL)  
 Christine Svetkovich, DEQ (by phone)

**Consultant:**

Jenny Carmichael, Carmichael Consulting

**Members Absent:**

Gary Lynch, DOGAMI

**Intermittent Members Not Present:**

Pat Allen, Office of Regulatory  
 Streamlining (RSL)  
 Dale Blanton, DLCD  
 Tony Stein, OPRD  
 Susan White, SHPO

**AGENDA**

<u>TIME</u>	<u>AGENDA ITEM</u>	<u>LED BY</u>
1:00	<b>Reminder Assignments, Updates</b>	Jenny
1:15	<b>Data Review (if available)</b>	Kirk and Ken
1:50	<b>Approve April 28, May 3 and May 10 Meeting Records</b>	Jenny
2:20	<b>BREAK</b>	
2:30	<p><b>Work Definition</b>                      Identify the work, work volume, who should do the work, and where</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="border: 1px solid black; padding: 5px; text-align: center;">Step 1. Preliminary Assessment</div> <input type="checkbox"/> <div style="border: 1px solid black; padding: 5px; text-align: center;">Step 2. Application</div> <input type="checkbox"/> <div style="border: 1px solid black; padding: 5px; text-align: center;">Step 3. Review</div> <input type="checkbox"/> <div style="border: 1px solid black; padding: 5px; text-align: center;">Step 4. Decision</div> </div> <ul style="list-style-type: none"> <li>• What is the work?</li> <li>• What are the deliverables?                             <ul style="list-style-type: none"> <li>• Work Volume?                                     <ul style="list-style-type: none"> <li>• Who</li> </ul> </li> </ul> </li> <li>• Process/product lead?                             <ul style="list-style-type: none"> <li>• Where?</li> <li>• Other?</li> </ul> </li> </ul>	Jenny
3:00	<p><b>Check-in: Required Legislative Changes?</b>                      - public review? timeline? next steps with agency placeholders</p>	
3:40	<b>Check-in: Changes/Additions to State Regulatory Coordinator Position Description?</b>	Kirk
3:55	<p><b>Meeting Wrap-Up</b>  <u>Next Meetings:</u>                      May 26, 9 – noon, <b>at DEQ in Portland</b>                      May 30, 1-4, Conference Room B, L&amp;I Building                      June 9, 9-noon, Directors Conference Room, 2<sup>nd</sup> Floor, L&amp;I Building</p>	Jenny

## MEETING RECORD

### 1. Reminder Assignments

Proposed Legislation. Kevin reported that the SRC position and the automation work with OSU have been combined into one bill. DSL will be submitting 16 bills. The SRC/Automation bill is DSL's 11<sup>th</sup> priority. DSL will also be submitting a fee bill for two positions to speed up wetland delineations. This bill is DSL's 10<sup>th</sup> priority.

User Guide. Kirk will be circulating the User Guide for consultant review. About 10 consultants have asked to be in the review loop. DSL will be adding Tim Acker and Amy Connors to the list along with a few other active consultants.

MOA. The team discussed the need for a consistent format for MOA provisions that will be written independently by each agency. Ideas regarding a possible template for the MOA will be discussed at an upcoming meeting.

### 2. Updates

DSL- SPGP Coordinator. Kevin Herrcamp has been hired to be DSL's new SPGP coordinator. One of his first assignments is to work on consistent water quality requirements for DSL, DEQ and NMFS.

### 3. Data Review (if available)

The data analysis will not be available until May 26.

### 4. Approve April 28, May 3 and May 10 Meeting Records

The meeting records were modified with some edits and approved.

### 5. Redesign Work Definition

**a. Mid-Level Redesign Decisions to Date.** Jenny presented a summary of decisions to date taken from April – May Meeting Records (see Attachment A) The team identified decisions that require more discussion.

**b. Work Definition Worksheets.** The team was asked to identify work characteristics for Steps 2, 3, and 4 of the redesigned process.



The result of the team's work is provided on Attachment B.

### 6. Check-In: Required Legislative Changes

ODFW Placeholder. The team discussed whether the placeholder from ODFW would be needed. ?????

Timeline for DSL Review. The team also discussed whether the timeline currently contained in regulations should be revised. Kevin and Kirk will work with DSL to check out the viability of the following possible timeline changes for INDIVIDUAL permits.

	<b>Completeness Review</b>	<b>Public Review</b>	<b>Agency Review</b>	<b>Decision</b>	<b>TOTAL</b>
<b>NOW</b>	30 days	30 days	Overlaps public review	60 days	120 days
<b>PROPOSED additions for consolidated statewide process</b>	Add 15 days	Add 0 days	Add 15 days	Add 30 days	
<b>NEW</b>	45 days	30	15 days	90 days	180 days

Consolidated/Simultaneous Public Review. The team concluded that statutory change will not be required to combine public reviews of DEQ, ODFW and DSL. Jas will be researching whether the public reviews can be simultaneous or consolidated.

**7. Check-in: Changes/Additions to State Regulatory Coordinator Position Description.**

Kevin and Kirk will be evaluating whether this position should be a Level 3 or 4.

**9. Wrap-Up.**

The meeting concluded at 4:20 pm. The next meeting will be May 26, 9- noon at DEQ headquarters in Portland.

WRPPIT Mid-Level Redesign Decisions To Date  
As of May 24, 2006  
(please see attached meeting record excerpts for documentation)

**Note: shaded areas need further discussion.**

**1. Advisory Committee: have one agency manage all requirements and have one integrated set of conditions.** *Mar 24 WRPPIT Audits Committee – don't give up on feds. April 5 WRPPIT*

Continue with a stacked permit approach. Further changes: standardize 401 conditions in ORFP Process for projects that require a 401. Simultaneous/consolidated 401 and ORFP public review process. DLCD/CZM too? See 1200-C discussion below. No changes regarding water rights, ODFW, DOGAMI.

DEQ will be proposing a fee bill in 2007 to continue the 401 program.

Rejected idea of a co-located team.

Will engage the Corps when team has an MOA. Team plans to involve Corps in pre-application meeting.

“Present one integrated set of conditions like ODOT’s ‘environmental standards’ for the bridge program that clearly define which agency is responsible for what. All other agencies defer to the designated agency on specific topics.” *Mar 24 WRPPIT*

Clarify how integration, removal of conflict would happen. *April 5 WRPPIT*

Adjust the steps of the redesigned process as follows: *April 5 WRPPIT*



**2. SRC – DSL to ask for 1 position to fund statewide coordinating, shepherding and convening role.**

General Fund.

No new staff for any other agency for ORFP. *April 28, WRPPIT*

**3. Expedited Wetland Delineation.** DSL will be submitting a fee bill in 2007.

**4. ODFW Changes.** *April 14 WRPPIT.* Patty at headquarters will take on responsibility of quality control

and consistency for ODFW participation. New duties:

- point person for ODFW involvement in removal-fill permits.
- Ensures quality and consistency of ODFW's contribution to removal-fill permits consistent with the aims of the redesign
- Train FB's and HB's and coordinate their work
- Ensure the same person is consistent throughout a particular permit or take steps to honor previous commitments.
- Develop standards.
- Review sample set(s) for consistency
- Develop: If then, then that
- Handle unusual cases
- Identify straightforward situations, no staff review involved
- Identify situations in which ODFW participation is not required in pre-application review.

**5. Enforcement.** Do not address in redesign, however, identify implications for compliance and enforcement based on the redesign such as – clarity about which agency will be responsible for which compliance and enforcement, clearer conditions will be easier to enforce, interagency training, User Guide information, identify important opportunities. *April 28 WRPPIT*

**6. Appeals.** Attachments to ORFP are separately appealable to the agency that issued them. *May 3 WRPPIT*

**7. 1200-C** *May 3 WRPPIT*

- a. SPGP's. DSL and DEQ will line up erosion control requirements so that requirements in a 1200-C permit match what is used in an SPGP. DSL and DEQ will also work with NMFS to try to use the same erosion control plan requirements across all three organizations.
- b. Individual Permits (All Other Applications):
  - 1) **If a 1200-C is required:** *the 1200-C application will be part of the Oregon Removal Fill Permit process, including public review. The 1200-C will be an attachment to the Oregon Removal-Fill Permit.\** DSL will not require an erosion control plan or include its standard 5 water quality conditions in the Oregon Removal-Fill Permit.
  - 2) **If a 1200-C is not required:** DSL will include its standard 5 water quality conditions in the Oregon Removal-Fill Permit.

(\*italicized phrases above require further team discussion. The process selected will need to work with DEQ's process that exists for the majority of 1200-C applications that do not require an Oregon Removal-Fill permit. )

**8. Pre-Application Meetings – DEQ and ODFW to be invited for:** *May 3 WRPPIT*

Any project that is more than 2 acres. Any project that is in-stream, involves gravel, wetlands, or an estuary. Any project that is complex, controversial, or unusual.

In addition for DEQ: any project where a 401 is required, dredging or contamination is involved, or any ERT project. DSL should contact DEQ's 401 coordinator who will then ensure that the right person(s) from DEQ participate. [Note – need to revisit to only identify which 401's DEQ will need to attend.]

In addition for ODFW: any project where fish passage or significant habitats or fish and wildlife issues (e.g. – spawning area, listed species, ESA's) are involved.

DEQ and ODFW do not necessarily need to be invited to a pre-application team meeting for the following projects:

- SPGP or GA eligible projects
- ODOT projects
- Small scale wetland restorations

It will be useful to ask the other agencies involved in the Oregon-Removal Fill permit to identify triggers for their involvement in a pre-application team meeting.

**9. Legislative Changes** – as few as possible. *April 28 WRPPIT*

# WRPPIT Meeting Record Excerpts

## Mid-Level Redesign Decisions To Date

*As of May 23, 2006*

Source: March 17 WRPPIT Meeting Record

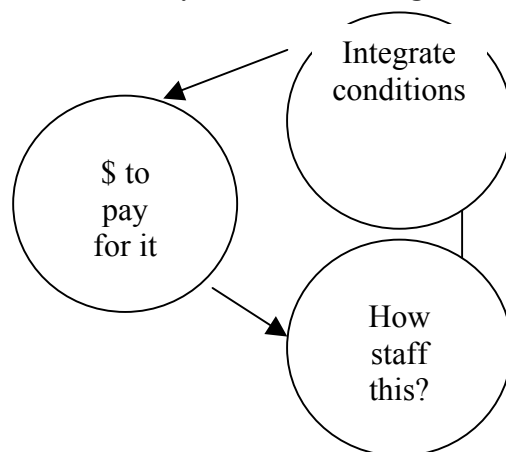
### DEQ – 401 and 1200-C.

The group agreed that DEQ review in the redesign should be limited to removal-fill permits that involve a federal nexus. Kirk and Christine conveyed the questions the group formulated and its answers:

- ◆ QUESTION: Is there some form of official statement regarding 401 water quality certification that can be incorporated into the new Oregon Removal-Fill permit?  
ANSWER: Explore this further as WRPPIT develops the Memorandum of Agreement and the mid-level redesign. Christine and Kirk will meet with their department's legal counsel to assess how this can happen. Legal counsel will also be asked to determine if the public notice process related to the Removal-Fill permit could be coordinated with the public notice process of the 401 certification which cannot occur until a 404 application has been filed.
- ◆ QUESTION: Can 1200-C requirements be incorporated into the new Oregon Removal-Fill permit?  
ANSWER: The group recommended that Don Yon from DEQ provide a presentation [in April] regarding DEQ's 1200-C program. . . . After hearing the presentation, WRPPIT will apply its knowledge of the redesign process to assess steps that could be taken to inform applicants of 1200-C requirements as part of the Oregon Removal-Fill permit. DEQ's issues regarding funding for the 1200-C program will be addressed separately from WRPPIT.

Source: March 24 WRPPIT Meeting Record

### Summary diagram from the Advisory Committee meeting on March 22



- . . . the team offered the following potential implications of the Advisory Committee meeting:
- SPGP created illusion of one door, DSL sends out to fiefdoms, and gathers one stacked decision. Applicants don't want an SPGP type process.
  - Committee wants a consolidated set of requirements, not collection of each agency's requirements. Integrate federal requirements.
  - Have staff you need in a single place to truly integrate permitting and that staff members would hold authority to make decision.
  - Management as a team.
  - Certified smart person leading.
  - Obtain expedited (wetland delineation) jurisdictional determination.

CORNERSTONES – Did Advisory Committee up-end the cornerstones or is it in the execution?

Redesigned PRODUCT	What we have proposed: a bundling What they want: an integrated permit
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Source: April 5 WRPPIT Meeting Record

Redesign Implications from March, 2006 Legislative Audits Committee Meeting

One stop enforcement (Senator Schrader)	Take a look at enforcement and compliance as part of the redesign.
Don't give up on the feds – engage them.	Engage the Corps 1) when we have settled on the redesign and 2) when we have the MOA. Also give notice of statutory changes under consideration. Remember that the local district may be willing to make changes, but they are regulated by national law.

**Discussion regarding 401 (and DLCD)**

Accepted Changes

- simultaneous public review (based on most recent input from Jas, will be examined further)
- identify general and standard conditions that are likely to apply to all Removal-Fill projects that require a 401
- BMP's for some projects

Changes Not to Be Pursued

- conditions for 401 be conditions in Oregon Removal Fill permit
- DEQ issues a certificate to DSL indicating that they don't find a problem with certain types of removal-fill projects (programmatic)
- Certain types of projects, particularly related to contaminants, DEQ uncomfortable identifying pre-set requirements
- Boiler plate conditions for "x" type of project
- Allow for continuous change to DEQ standards
- Standards and special conditions for classes of projects

The team discussed, at length, the question of whether these requirements could be issued in some way as an integrated part of the Oregon Removal-Fill permit, rather than as a separate notice attached to the Oregon-Removal Fill permit. Christine from DEQ clarified that DEQ issues the 401 certification on behalf of the US Army Corps of Engineers. If DEQ did not review projects for a 401 certification, the review would be conducted by the EPA. All agreed that DEQ review was preferable to EPA review.

**Changes to Attachment A – Cornerstones Document sent to Directors on February 28, 2006**

CORNERSTONE 1 – Redesigned Product

1. Clarify how integration, removal of conflict would happen
2. Present one integrated set of conditions like ODOT's "environmental standards" for the bridge program that clearly define which agency is responsible for what. All other agencies defer to the designated agency on specific topics.

CORNERSTONE 2 – Redesigned Process

The team would like to adjust the steps of the redesigned process as follows:



... It is important to the team that all steps in the process flow be value added steps for both applicants and the state.



State Regulatory Expert (SRE)

Question	Answer	Notes
<b>What's Needed from Applicant at this stage?</b>	Applicant approaches the CSRE with rough concepts about the project, for example, "here's what I'm thinking about . . ."	<i>ASK the resource coordinators: what is needed from the applicant at this stage?</i>
<b>ESTIMATED Work Volume</b>	There are about 250 IP's a year. Not all will contact a CSRE. CSRE will also need to provide some assistance with GA's. Estimated contacts per week: 5-10. Applicants will be both first time and complex projects. The work will be seasonal.	
<b>What is the work?</b>	<ul style="list-style-type: none"> <li>- Recommend a pre-ap or not</li> <li>- Identify regulatory requirements</li> <li>- Explain the process</li> <li>- Offer guidance</li> <li>- Conduct research</li> <li>- Tell applicant how to prepare for pre-ap</li> <li>- Contact other agencies for info</li> <li>- Provide technical information (handouts) and links</li> <li>- Identify who needs to be at pre-ap</li> </ul>	
<b>Where:</b>	DSL. Can be face-to face although other means of communication may work – video conference, phone or e-mail. Bend/Salem?	
<b>Who?</b>	Options: <ul style="list-style-type: none"> <li>- Single person</li> <li>- All resource coordinators</li> <li>- A subset of the resource coordinators</li> </ul>	<i>ASK the resource coordinators: best option</i>
<b>Expectations of other agencies:</b>	<ul style="list-style-type: none"> <li>- responsive to research questions</li> <li>- assist with User Guide, keep it current.</li> </ul>	
<b>The CSRE needs:</b>	<ul style="list-style-type: none"> <li>- Needs a good understanding of all agency requirements</li> <li>- Needs to be ramped up with cross-training</li> <li>- Needs to use the User Guide</li> <li>- Needs experience at doing this work</li> <li>- Needs to know who to call</li> </ul>	<i>ASK the resource coordinators: what is needed for a CSRE to do this work</i>
<b>The CSRE does not need</b>	to be a water quality or fish or other specialty expert.	

Additional decision: only agencies that are considered needed at the pre-ap will be identified by the CSRE. All agencies will not receive pre-ap information for evaluation.

**Question: Who could identify who should be involved in the Pre-Ap meeting:**

1. INR technology (used by applicant and state staff)
2. Have someone review proposal, know answers or get them
3. Send to agencies & self-identify
4. Applicant determines
5. Hybrid of 1 & 2
6. Experienced applicant identifies agencies
7. Agencies supply information: if this, then that

**To be decided: Who sends out the invites and sets up the pre-ap meeting?**

e. Team Preliminary Assessment

Note: Have feds attend this team meeting if possible.

Question	Answer	Notes
<b>ESTIMATED Work Volume</b>	Two a week. Subset of the 5-10 SRE contacts per week. Likely to be the following - complex projects - unusual projects - political projects Likely to happen in the winter time	
<b>What is the work?</b>	<u>A continuum of customer service tailored to the project.</u>  <u>Meeting Preparation</u> – review applicant information <u>Give feedback</u> to applicant at meetings. - Describe “rocks” – what gets to a yes - critique of project within OAR’s - list of issues to address - list of issues that will not need to be addressed - technical information - links <u>Written Report:</u>  Note: this may involved multiple meetings.	<i>Checklist?</i>
<b>Where:</b>		
<b>Who?</b>	Facilitator and note taker – neutral person Same people as do the state review Have an intact team do all steps related to a single application Permit expert from each agency, as applicable	

**Brainstorm possible team configurations:**

- Option 1. Regulatory expert who serves as convenor, facilitator, notetaker
- Option 2. Resource Coordinator = permit processor

**ODFW Support to Multi-Agency Team Reviews**

- Patty at headquarters
  - 1) Point person for ODFW involvement in removal-fill permits.
  - 2) Ensures quality and consistency of ODFW’s contributions to removal-fill permits consistent with aims of the redesign.
  - 3) Train FB’s & HB’s and coordinate their work
  - 4) Ensure the same person is consistent throughout a particular permit or take steps to honor previous commitments
  - 5) Develop standards
  - 6) Review sample set(s) for consistency
  - 7) Develop: if this, then that
  - 8) Handle unusual cases
- Fish Biologists and Habitat Biologists (~ 24)
- If this, then that – straightforward situations, no staff review involved
- If you do this, there will be no issue, and ODFW does not need to participate in pre-ap meeting.

**Compliance and Enforcement.** The team outlined the following choices to address the step of compliance and enforcement in the redesign:

- a. silent
- b. identify the implications for compliance and enforcement based on redesign of the process
- c. redesign compliance and enforcement

The team agreed on option b. Topics to be covered include: clarity about which agency will be responsible for which compliance and enforcement, clearer conditions will be easier to enforce, interagency training, User Guide information, identify important opportunities.

**Discussion Item #1: Kirk outlined two possible choices for delivering the preliminary assessment:**

- a. applicant/consultant led approach where the consultant is responsible to identify issues and facilitate/coordinate the state's response.
- b. state regulatory expert (SRE) is responsible to identify issues and facilitate/coordinate the state's response.

The team unanimously preferred option b.

Discussion Item #2: how to staff the state regulatory expert (SRS) -by fee or general fund.

The work of an SRE is broader than the current resource coordinators. The SRE will need to know all agency requirements and assume the centralized role of DSL in the redesigned process.

Further work is needed to define the scope of the SRE, what needs to be funded, and how it should be funded. This should include the work of a shepherd, someone to coordinate the state's response to defined applicants. This would include convening the team pre-application meeting.

Discussion Item #3: additional fee or general fund for the work of other agencies in support of the team preliminary assessment. Decision: no additional cost.

**Redesign Assumptions.** The team identified changes in redesign assumptions that had evolved over the last several meetings. While increased funding and statutory changes had been available directions in earlier discussions, the team at this point is striving to minimize either of these options.

**Appeals.** . . . appeals to conditions contained in any attachment to the Oregon Removal Fill Permit will be severable and separately appeal-able to ODFW or DOGAMI. The DSL Oregon Removal-Fill Permit will be an order from DSL. Attached authorizations from ODFW and DOGAMI will be orders from those agencies.

In addition to the Oregon Removal-Fill Permit, applicants will need to separately obtain the following authorizations. To achieve as much state coordination with these permits as possible, DSL will give notice of requirements expected to be required with these authorizations, assuming the project does not change.

DEQ – 401 Water Quality Certification  
DLCD - Coastal Zone Management (CZM) Federal Consistency Review  
WATER RESOURCES DEPARTMENT – Water Use Authorization

. . . These authorizations will also be separately appeal-able to the agency that issues them.

**1200-C: Stormwater Management Permit.**

The team concluded the following:

- c. SPGP's. DSL and DEQ will line up erosion control requirements so that requirements in a 1200-C permit match what is used in an SPGP. DSL and DEQ will also work with NMFS to try to use the same erosion control plan conditions across all three organizations.
- d. Individual Permits (All Other Applications):
- 1) **If a 1200-C is required:** *the 1200-C application will be part of the Oregon Removal Fill Permit process, including public review. The 1200-C will be an attachment to the Oregon Removal-Fill Permit.\** DSL will not require an erosion control plan or include its standard 5 water quality conditions in the Oregon Removal-Fill Permit.
  - 2) **If a 1200-C is not required:** DSL will include its standard 5 water quality conditions in the Oregon Removal-Fill Permit.

(\*italicized phrases above require further team discussion. The process selected will need to work with DEQ's process that exists for the majority of 1200-C applications that do not require an Oregon Removal-Fill permit. )

#### **When does the State Regulatory Expert need to invite ODFW and DEQ to a pre-application meeting?**

##### Answer:

Any project that is more than 2 acres. Any project that is in-stream, involves gravel, wetlands, or an estuary. Any project that is complex, controversial, or unusual.

In addition for DEQ: any project where a 401 is required, dredging or contamination is involved, or any ERT project. DSL should contact DEQ's 401 coordinator who will then ensure that the right person(s) from DEQ participate.

In addition for ODFW: any project where significant habitats or fish and wildlife issues (e.g. – spawning area, listed species, ESA's) are involved.

DEQ and ODFW do not need to be invited to a pre-application team meeting for the following projects:

- SPGP or GA eligible projects
- ODOT projects
- Large scale wetland restorations

It will be useful to ask the other agencies involved in the Oregon-Removal Fill permit to identify triggers for their involvement in a pre-application team meeting.

Source: May 10 WRPPIT Meeting Record

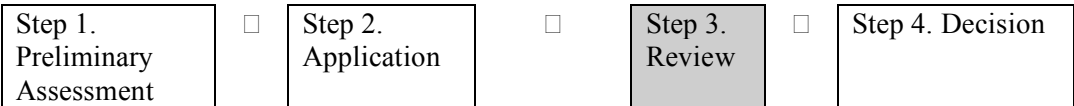
#### **State Regulatory Coordinator – DSL – Position Description**

Position Description developed for 1.0 FTE state regulatory coordinator. Fee bill to be submitted by DSL.

## WRPPIT Redesign Work Definition



1.	What is the work?	Prepare and submit an application (Applicant)  Acknowledge receipt (DSL)  Agency reviews for completion (DSL + other agencies as needed)
2.	What are the deliverables?	Acknowledgement (DSL)  Letter documenting result of completeness review (DSL)  Complete or Withdrawn Application (Applicant)
3.	What is the work volume?	700  Kevin will be checking on percent of applications that cycle back for missing items.
4.	Who will do the work?	See item 1 above.
5.	Who will be the Product Lead for each product in this step?	DSL
6.	Where will the work be done?	Bend, Salem, South Slough, La Grande (?)
7.	What is new work?	Completeness check for other agencies (SRC not involved in this step unless questions, check lists, templates)
8.	Implications for Statutory Change	May take more than 30 days time limit to conduct completeness review. More things to check. Promotes kicking application out as incomplete, restarts 30 days.



1.	What is the work?	Post application for public  Coordinated team review and identify conditions to agencies
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		<p>Send applications to agencies</p> <p>Send comments in (Public)</p> <p>Flag applications for agencies (who flags – agencies can't review all applications)</p> <p>Coordinated communication to applicant documenting and integrating state review and public comment and requesting additional information</p> <p>Modified Application</p> <p>Receive Modified application and re-review</p> <p>Agency Conflict Resolutions</p>
2.	What are the deliverables?	<p>Letter to Applicant documenting team review and public review.</p> <p>Public Comment to applicant if appropriate</p> <p>Reconciled agency conflicts</p> <p>Revised Application (if iterative)</p> <p><u>Final Deliverable</u></p> <p>Determination if a project meets state standards and what conditions are required.</p>
3.	What is the work volume?	<p>700 a year</p> <p>See work volume annotation below.</p>
4.	Who will do the work?	
5.	Who will be the Product Lead for each product in this step?	
6.	Where will the work be done?	
7.	What is new work?	
8.	Implications for Statutory Change	

**Work Volume Annotation for Step 3 – Agency Review and Step 4 – Decision.**

Work Volume Estimate – IP’s

☐Continuum of Multi-Agency Involvement Anticipated Under the Redesign and SPGP☐

“Blue” Level Most GA’s 400 GA’s annually	<.....>	..... Some GA’s and Some IP’s	Gnarly IP’s 300 IP’s annually 10 a year that are really gnarly
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E-Mail .....	Chat Room .....	Phone Conference .....	In Person Meeting
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☐Continuum of Multi-Agency Communication Anticipated☐